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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In Re: §
§
HOACTZIN PARTNERS, L.P., § Case No. 19-33545-sgj7
§
§
Debtor. §
§

**TRUSTEE'S MOTION FOR AUTHORITY TO
EXECUTE CONTRACT FOR DECOMMISSIONING
WITH CHET MORRISON CONTRACTORS, LLC**

Anne Elizabeth Burns (the “Trustee”), Chapter 7 Trustee in the above-captioned case, files this *Motion for Authority to Execute Contract for Decommissioning with Chet Morrison Contractors, LLC*. In support, the Trustee respectfully shows the Court as follows:

1. The Court has jurisdiction over this case and this Motion under 28 U.S.C. §§ 157 and 1334. This Motion concerns the administration of the estate and is therefore a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue is proper under 28 U.S.C. § 1409.
2. By this Motion, the Trustee is seeking entry of an order authorizing her to execute the Contract between the Trustee and Chet Morrison Contractors, LLC (“Morrison”) attached

hereto as **Exhibit A** (the “Contract”).¹

3. The Contract was prepared by the Trustee’s professionals, including Drew Hunger of Petrostream and the Trustee’s proposed special counsel, Glen Legge, and negotiated over the course of the past several weeks with Morrison.

4. The Contract outlines the scope of work Morrison will perform in order to complete all required plugging, abandonment, and decommissioning of all leases, platforms, and pipelines for which Hoactzin is responsible under applicable law. Successful completion of these obligations has been the Trustee’s goal since her appointment, and it is the only viable alternative to dismissal of this case.

5. Contemporaneously with this Motion, the Trustee is filing her *Motion for Entry of Stipulation and Agreed Order* seeking approval of a Stipulation and Agreed Order (the “Stipulation”) between the Trustee and 9 other parties, including all working interest owners on the Debtor’s leases, that provides funding for the Contract, insurance, and administrative costs. All of the parties to the Stipulation have also had an opportunity to review the Contract and provide input.

6. The Trustee has been granted authority to operate the business of the Debtor under section 721 of the Code (Docket No. 199). To that end, the Trustee, in her business judgment, believes that entering into the Contract is in the best interest of this estate and is consistent with the orderly liquidation of this estate.

WHEREFORE, the Trustee respectfully requests the Court enter an order authorizing her to execute the attached Contract with Morrison and granting the Trustee such other and further relief to which she may be justly entitled.

¹ The Trustee and Morrison are still working to get the Contract in final form. The Trustee intends to file a final, signed version of the Contract prior to the hearing on this Motion.

Respectfully submitted,

/s/ Emily S. Wall

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